

MARGARET A. MCLEATCHIE, Nevada Bar No. 10931

LEO S. WOLPERT, Nevada Bar No. 12658

MCLEATCHIE LAW GROUP, PLLC

602 South 10th Street

Las Vegas, NV 89101

Telephone: (702) 728-5300 / Fax: (702) 425-8220

Email: efile@nvlitigation.com

JOHN D. MCKAY, California Bar No. 220202 (*admitted pro hac vice*)

PARK AVENUE LAW LLC

201 Spear Street, Suite 1100

San Francisco, CA 94105

Telephone: (434) 531-9569 / Fax: (407) 264-6551

Email: johndmckayatty@gmail.com

Counsel for Plaintiffs Peter DelVecchia and A.D., a Minor

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

PETER DELVECCHIA, *et al.*,

Plaintiffs,

Vs.

FRONTIER AIRLINES, INC., *et al.*,

Defendants.

Case No: 2:19-CV-01322-KJD-DJA

**PLAINTIFF'S REPLY IN SUPPORT OF
MOTION FOR EXTENSION OF TIME TO
FILE RESPONSE TO MOTION FOR
SUMMARY JUDGMENT**

Plaintiffs, Peter DelVecchia individually and as next friend of A.D., a Minor, by counsel, respectfully submit this Reply in support of their Corrected Motion to Extend Time to Respond to Defendants' Motion for Summary Judgment (ECF No. 270).

As Defendants condition their assent but do not oppose the Motion, Plaintiffs respectively request that the Court grant their Motion to allow them to file their Response to Defendants' Motion

1 for Summary Judgment on November 30, 2023.¹ Of course, in the event Defendants find that they
2 need additional time to file their Reply in support of their Motion for Summary Judgment, Plaintiffs
3 would not oppose such a request if it sought an extension of two weeks or less (and would likely enter
4 into a Stipulation requesting the extension, to save the Court's time, as Plaintiffs' counsel attempted
5 to do on November 16).

6
7 DATED this 28th day of November, 2023.

8 /s/ John D. McKay

9 John D. McKay

10 ***Attorney for Plaintiffs Peter DelVecchia***
11 ***and A.D., a Minor***
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

27 _____
28 ¹ Plaintiffs' motion to exceed the page count (ECF No. 273) is pending; Plaintiffs also respectfully
request the Court grant that motion to allow Plaintiffs sufficient space to address all the necessary
factual and legal issues in this complex case.